

mnevarez@lawofficesmrn.com

From: Brandon Callier <callier74@gmail.com>
Sent: Monday, January 23, 2023 9:16 AM
To: mnevarez@lawofficesmrn.com
Cc: paralegal-2@lawofficesmrn.com
Subject: Re: Callier v. PAC WESTERN FINANCIAL LLC et al, Case 3:22-cv-00301-FM
Attachments: Fawzy Email April 5 2022 Exhibit L.pdf

Mr. Nevarez,

I will file my amended complaint today as opposed since you did not answer me.

I do not oppose amending your answer.

The attached emails I received from Mr. Fawzy and Mr. Scott on behalf of JaScott investments include phone numbers, email domains, website, and business addresses for JaScott Enterprises. Any reasonable consumer would believe, as I do, that JaScott Enterprises is involved in the solicitation. Is JaScott's Enterprises website <https://www.jascott.org?>

Thank you,

Brandon Callier
915-383-4604

On Mon, Jan 23, 2023 at 8:59 AM <mnevarez@lawofficesmrn.com> wrote:

Mr. Callier,

Please consider this my meet and confer re the below.

Defendant Jascott Enterprises, LLC is real estate company and had NO involvement in subject matter. On the other hand,

Jascott Investments LLC is the entity that was involved in attempting to process your loan application. In other words, you sued the wrong entity.

Please advise if you oppose me filing a motion for leave to amend Defendant's Answer, as I will be filing same today.

If you have any questions or comments, feel free to contact me at your convenience.

Michael R. Nevarez
Attorney at Law

The Nevarez Law Firm, PC
Attorneys And Counselors At Law
Mailing Address:
P.O. Box 12247
El Paso, TX 79913
Telephone: (915) 225-2255
Facsimiles: (915) 845-3405
Website: <http://www.NevarezLawFirm.com/>

CONFIDENTIALITY NOTICE: This electronic email communication and any attachments are confidential and intended only for the person to whom it is addressed. The information contained in this electronic mail transmission may be protected by and subject to the attorney-client privilege, or be privileged work product or proprietary information. If you are not the addressee (or one of the addressees) you are not an intended recipient. If you are not an intended recipient, or an agent responsible for delivering it to an intended recipient, you have received this email in error. In that event, please (i) immediately notify me by reply email, (ii) do not review, copy, save, forward, or print this email or any of its attachments, and (iii) immediately delete and/or destroy this email and its attachments and all copies thereof. You are hereby notified that any use, disclosure, dissemination, distribution, copying, or taking of any action because of this information is strictly prohibited.

TAX ADVICE DISCLOSURE: Pursuant to the requirements of Internal Revenue Service Circular 230, we advise you that any federal tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of: (1) avoiding penalties that may be imposed under the Internal Revenue Code or (2) promoting, marketing or recommending to another party any transaction or matter addressed in this communication. Thank you.

DEBT RELIEF AGENCY: Our law firm is considered a "Debt Relief Agency" under the Bankruptcy Reform Act, as defined in 11 U.S. Code § 101(12A), as we assist people with finding solutions to their debt and credit problems, including, where appropriate, assisting them with the filing of petitions for relief under the United States Bankruptcy Code.

FAIR DEBT COLLECTION PRACTICES ACT: Pursuant to the Fair Debt Collection Practices Act, please be advised that this law firm is a debt collector and any information obtained may be used for that purpose. However, if the debt is in active bankruptcy or has been discharged through bankruptcy, this communication is not intended as and does not constitute an attempt to collect a debt.

From: Brandon Callier <callier74@gmail.com>
Sent: Wednesday, January 11, 2023 12:43 PM
To: mnevarez@lawofficesmrn.com
Cc: Ashley Presson <apresson@grsm.com>; David J. Kaminski <kaminskid@cmtlaw.com>; Jim Astrinakis <AstrinakisJ@cmtlaw.com>; Roberta Espinoza <espinozar@cmtlaw.com>; Calvin Davis <davisc@cmtlaw.com>; Pat Lopez <lopezp@cmtlaw.com>; paralegal-2@lawofficesmrn.com
Subject: Meet and Confer - Amending Compliant

Mr. Nevarez,

I am in the process of writing a formal letter in answer to the incredible discovery responses I received from you/your client. I find it utterly amazing you and your client claim your client has "never had any contact or communication with Plaintiff Brandon Callier." This is quite interesting considering the attached emails. I am in possession of numerous other emails, text messages, recordings, and phone records that directly contradict this assertion. I can only describe this as an outrageous refusal to engage in good-faith discovery.

I am putting together my formal response and asking for a meet and confer. Afterward, I hope we can move forward in an amicable manner. If not, I will be going to the Court with a Motion to Compel.

Finally, I need to amend the Complaint and bring in the correct "Upwise" entity. I also plan on bringing in Mr. Mallaiah as a personal defendant. I need to know whether you oppose my amendment.

Thank you,

Brandon Callier